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366 Lafayette Avenue #4
Brooklyn, New York 11238
June 25, 1993

Rep. Edolphus Towns
U.S. House of Representatives
2232 Rayburn HOB
Washington, DC 20515

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Dear Rep. Towns:

As your constituents, we are writing to express our concern for your outspoken support of "must carry" privileges for so-called "home shopping" television stations. Since the FCC is currently considering what to do about these stations, we are writing to ask that you reconsider your position to differentiate between the importance of protecting the viability of existing stations and the dangers of creating a permanent service for minority audiences that does not in any way meet the needs of the community.

Preliminarily, we want to make clear that we are not opposed to stations which broadcast home shopping programming on a part-time basis, at least during periods of economic distress. Our opposition is to giving the extraordinary privilege of must carry to those stations which employ this programming for a majority of the day.

We have read that a major reason for your support of these stations is the fact that a number of them are owned by minorities. As African-Americans, we share your concern about increased minority ownership of broadcast stations, and we applaud your support for FCC policies intended to promote minority ownership.

However, we do not agree that all home shopping stations should be given special benefits they do not deserve, just because a few are owned by minorities. The FCC's minority ownership initiatives were preserved by the Supreme Court largely because they promote the public's right to receive a diversity of information, viewpoints and cultural perspectives over the airwaves. Full-time home shopping stations do not advance these goals.

The program diversity objectives of the FCC's minority ownership policies simply are not served by a rigid format in which 55 minutes per hour is satellite delivered commercial matter entirely conceived and controlled by non-minorities who may have come within a thousand miles of the community to which the station is licensed. Unlike ordinary stations for which even syndicated programs are selected by minority licensees with a view towards what best serves their community, these stations do not meaningfully expand viewing options for entertainment, music, drama and other programming which addresses the needs of minority viewers which have been ignored by other stations.

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The problems posed by nationally distributed home shopping formats are exacerbated by the fact that these minority broadcasters typically are contractually prohibited from deviating from the inflexible home shopping format even if they determine that other programming would better serve the community. Those who vary even slightly from the typical home shopping format generally do so face the pain of being forced to sell the station or immediately pay back their huge loans.

Unfortunately, the majority of minority owned television stations, financed by home shopping networks, are relegated to the presentation of day long commercial sales pitches. This leaves unfulfilled the minority community's right to receive longer form entertainment programming which addresses their specific cultural needs. We believe your efforts should be directed towards helping minorities become full-fledged members of the broadcast community, for their benefit, and for the benefit of the communities they are licensed to serve.

How to treat existing stations is an entirely separate matter, as is the question of whether temporary use of home shopping by new or struggling stations should be allowed. While we are opposed to granting "must carry" status to any station which carries home shopping programming for more than half of each day, we certainly agree that minority owned stations which are currently engaged in such programming should be given ample opportunity to change